

Privacy Policies and Procedures (Extract)

Collins Foods Group POLICY	POLICY NUMBER HR 15
	EFFECTIVE DATE 21/12/01
TITLE Privacy Act - Policies and Procedures (Extract)	

10 Scope and Objectives

The Privacy Policies and Procedures implemented by the Collins Foods Group extends to and covers all operations and functions of the organisation. All directors, management, employees, contractors, sub-contractors, vendors, service providers, customers, agents or any other third parties that have access to and/or utilise personal information collected and/or held by the Collins Foods Group must abide by these Privacy Policies and Procedures.

The objectives of these Privacy Policies and Procedures are to ensure that a sound privacy foundation and framework is established and maintained by the Collins Foods Group.

{Privacy Policies are defined as the broad statements describing required privacy objectives and incorporate the 'National Privacy Principles'. Privacy Procedures are defined as the measures intended to ensure that the Privacy Policies or objectives are properly met.}

20 Ownership

All personal information collected, held or shared by the Collins Foods Group must be done so in accordance with its Privacy Policies and Procedures. The Collins Foods Group retains the right to take reasonable steps to ensure that its Privacy Policies and Procedures are properly adhered to.

A Privacy Officer has been appointed to ensure compliance with these Privacy Policies and Procedures where, in the operation or function of the Collins Foods Group, personal information is collected.

30 Responsibilities

It is the responsibility of the Executive Committee to inform employees and other relevant parties that Privacy Policies and Procedures are established, maintained and enforced. The Executive Committee must ensure that they periodically advise the Collins Foods Group's employees, and other relevant parties, of any changes or any new Privacy Policies and Procedures, in a timely manner.

It is the responsibility of all employees and other relevant parties to ensure that they understand and adhere to all Privacy Policies and Procedures implemented by the Collins Foods Group and that they maintain up-to-date knowledge of changes or any new Privacy Policies and Procedures.

Ignorance of the existence of any Privacy Policies or Procedures will not be an acceptable excuse for non-compliance.

Privacy Policies and Procedures (Extract)

40 Privacy Training

All new employees must be provided with timely and appropriate access to the Collins Foods Group's Privacy Policies and Procedures. All employees must ensure that they understand the Privacy related issues that could adversely affect the Collins Foods Group's position if not properly adhered to.

50 Non-compliance & Disciplinary Actions

Any Collins Foods Group employee or relevant third party that identifies, knows about or suspects a privacy breach must immediately report the matter to the Privacy Officer.

Employees or other relevant parties that contravene or do not comply with the Collins Foods Group's Privacy Policies and Procedures may be subject to disciplinary action.

Policy Revision Date: 5/12/2001

50.010 Definitions of
Non-compliance

Non-compliance is defined as follows:

- a) a breach of the Collins Foods Group's Privacy Policies and Procedures;
- b) the compromise of Privacy controls exposing the Collins Foods Group to potential or actual loss, monetary or otherwise;
- c) any action that is perceived to be illegal, harassing, offensive or that can adversely affect the integrity and reputation of the Collins Foods Group ;
- d) an attempt, successful or otherwise, to gain unauthorised access to the Collins Foods Group 's information systems resources;
- e) the use of unauthorised the Collins Foods Group information for personal gain;
- f) the refusal to co-operate with any reasonable investigation;
- g) unauthorised access, viewing, disclosure or manipulation of confidential data, information, applications, systems and other of the Collins Foods Group's information systems resources; and
- h) using the assistance of or soliciting a third party to circumvent the Collins Foods Group

Procedure Revision Date: 5/12/2001

50.020 Disciplinary Actions for
Non-compliance

The following disciplinary actions for non-compliance with the Collins Foods Group's Privacy Policies and Procedures are within management's discretion:

- a) further education and training;
- b) counselling;
- c) issue of warnings;
- d) suspension of system access rights;
- e) financial penalties and recovery of costs;
- f) immediate dismissal;
- g) termination of contractual agreements;
- h) civil or criminal prosecution; and
- i) other disciplinary actions.

60 Incidents/Complaints Handling

The Collins Foods Group has an effective incidents/complaints handling process in place to manage privacy risks and issues.

Refer Privacy Officer Guidelines on Access and Correction of Personal Information

70 Contractual Arrangements

The Collins Foods Group must ensure that all contractual arrangements with third parties adequately address privacy issues.

80 Information Classification

All the Collins Foods Group data and personal information must be classified and secured according to its level of sensitivity.

90 Privacy Audits

The Collins Foods Group must conduct periodic privacy audits in order to ascertain:

- what sort of personal/sensitive information is collected and held;
- how that information is collected;
- what the reasons are for collection of that information;
- where and how that information is stored;
- how that information is secured;
- who has access to that information;
- whether that information is shared with anyone;
- whether the intended use of collection is communicated; and
- whether that information is current and necessary.

100 Privacy Statements

The statements and/or comments that are either required to be or are made about privacy or privacy related issues must be done so with regard to the Collins Foods Group's Privacy Policies and Procedures.

110 Collection (NPP 1)

Collection of personal information by the Collins Foods Group must be fair, lawful and not intrusive. A person must be told our organisation's name, the purpose of collection, that the person can get access to their personal information and what happens if the person does not give the information.

120 Use and Disclosure (NPP 2)

The Collins Foods Group should only use or disclose information for the purpose for which it was collected unless the person has consented, or the secondary purpose is related to the primary purpose and a person would reasonably expect such use or disclosure, or the use is for direct marketing in specified circumstances, or in circumstances related to public interest such as law enforcement and public or individual health and safety.

130 Data Quality (NPP 3)

The Collins Foods Group must take reasonable steps to make sure that the personal information it collects, uses or discloses is accurate, complete and up-to date.

140 Data Security (NPP 4)

The Collins Foods Group must take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access modification or disclosure.

140.020 Destruction of Unrequired Personal Information

The Collins Foods Group must take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used or disclosed under Policy Number 120 - National Privacy Principle 2.

150 Openness (NPP 5)

The Collins Foods Group have a policy document outlining its information handling practices and will make this available to anyone who asks.

160 Access and Correction (NPP 6)

Generally speaking, the Collins Foods Group must give an individual access to personal information it holds about that individual on request.

Refer Privacy Officer Guidelines on Access and Correction of Personal Information

170 Identifiers (NPP 7)

Generally speaking, the Collins Foods Group must not adopt, use or disclose an identifier that has been assigned by a Commonwealth government 'agency'.

170.30 Definition of an Identifier

An identifier includes a number assigned by an organisation to an individual to identify uniquely the individual for the purposes of the organisation's operations. However, an individual's name or ABN (as defined in the A New Tax System (Australian Business Number) Act 1999) is not an identifier.

180 Anonymity (NPP 8)

The Collins Foods Group must give people the option to interact anonymously whenever it is lawful and practicable to do.

190 Transborder Data Flows (NPP 9)

The Collins Foods Group can only transfer personal information to a recipient in a foreign country in circumstances where the information will have appropriate protection.

200 Sensitive Information (NPP 10)

The Collins Foods Group must not collect sensitive information unless the individual has consented, it is required by law - or in other special specified circumstances, for example, relating to health services provision and individual or public health or safety.

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